

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

DIRECT REPORT CORPORATION d/b/a)
SHAREHOLDER.COM,)

Plaintiff,)

v.)

Civil Action No. 04-10535-PBS

CCBN.COM, INC., THE THOMSON)
CORPORATION, JOHN DOES 1)
THROUGH 5, AND JANE DOES 1)
THROUGH 5,)

Defendants.)

**DEFENDANT ADLER'S MOTION TO IMPOUND HIS MOTION
FOR A PROTECTIVE ORDER, OR, ALTERNATIVELY, TO
QUASH PLAINTIFF'S SUBPOENAS TO INSPECT HIS PERSONAL
COMPUTERS AND HIS MEMORANDUM SUPPORTING THAT MOTION**

Defendant Robert Adler ("Adler") hereby moves to impound his Motion For A Protective Order, Or, Alternatively, To Quash Plaintiff's Subpoenas To Inspect His Personal Computers, as well as his memorandum supporting that motion, which are being delivered by hand to the Court today. Impoundment is necessary because Adler's motion and memorandum contain references to matters that are covered by the Stipulated Protective Order issued by this Court, which Adler does not want to violate. Counsel for Defendants CCBN.com, Inc. and The Thomson Corporation have assented to this motion to impound. Counsel for Plaintiff had not decided whether to assent to this motion at the time of this writing.

ROBERT ADLER,

By his attorneys,

/s/Mark B. Dubnoff

Richard J. McCarthy (BBO 328600)

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May 18, 2005

LOCAL RULE 7.1(a)(2) CERTIFICATION

The undersigned hereby certifies, pursuant to Local Rule 7.1(a)(2), that counsel for Adler has communicated with counsel for the other named parties and attempted in good faith to resolve the issues presented in this motion. Counsel for co-defendants agreed to impoundment. Counsel for Plaintiff said he needed more time to decide whether to assent to this motion.

/s/Mark B. Dubnoff

Mark B. Dubnoff